

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re INDYMAC MORTGAGE-BACKED  
SECURITIES LITIGATION

Master Docket No. 09-Civ.04583 (LAK)  
ECF CASE

This Document Relates To:  
ALL ACTIONS

**SUPPLEMENTAL DECLARATION OF PATRICK T. EGAN**

I, PATRICK T. EGAN, declare as follows:

1. I am a partner in the law firm of Berman DeValerio, Court-appointed lead counsel (“Lead Counsel”) for the Court-appointed Lead Plaintiffs, Wyoming Retirement System (“WRS”) and Wyoming State Treasurer (“WST”) (“Lead Plaintiffs”), in this consolidated securities class action (the “Action”). I have personal knowledge of the matters set forth herein based on my participation in the prosecution and settlement of the claims asserted on behalf of the Settlement Class in the Action.

2. I respectfully submit this Declaration in support of Lead Plaintiffs’ Reply Memorandum of Law in Further Support of Motions for Approval of the Proposed Class Action Settlement with the Individual Defendants and Award of Litigation Expenses.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Supplemental Affidavit of Eric J. Miller Regarding Notice Administration.

4. Counsel for the Settling Defendants have informed me that, pursuant to the Court’s December 10, 2012 order (ECF No. 399), they will submit the sworn financial statements to Chambers by December 13, 2012 for an *in camera* review.

5. Lead Counsel has no objection to an *in camera* review of the Settling Defendants' confidential financial statements.

I declare, under penalty of perjury under the laws of the United States of America, that the foregoing facts are true and correct. Executed on December 11, 2012 in Boston, Massachusetts.

s/ Patrick T. Egan  
Patrick T. Egan